

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DOMINICK TALARICO and	:	CHAPTER 13
MAUREEN TALARICO	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
DOMINICK TALARICO and	:	
MAUREEN TALARICO	:	
Respondent(s)	:	CASE NO. 5-17-bk-02412

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 6th day of November, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. The plan is underfunded relative to claims to be paid.
  - b. Plan ambiguous – Provides for adequate protection payments to NET Federal Credit Union but the claim of the creditor is not mentioned or otherwise treated or provided for in Sections 2.D or 2.E of the Plan.
2. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
  - a. Proof of Claim for Aaron's.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 6th day of November, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Raymond Ferrario, Esquire  
538 Spruce Street  
Scranton Life Bldg., Suite 528  
Scranton, PA 18503

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee